

From: Rand Crafts
To: mradulov@deq.state.ut.us
Date: Tuesday, November 13, 2001 6:59:33 AM
Subject: RE: Draft AO - Comments

Milka,

Hope you had a good holiday. The following are comments received via internal & external reviews. Most are typo / format type of corrections, but can affect basis of fact:

✓ In the engineering review abstract, on page 3, where the expected emission increases are listed, a total of 1.221 tons for HAPs is shown. I can't seem to make it add up with our tables later on. Can you help me?

✓ Although the engineering review abstract correctly identifies adding one helper tower per unit (Item 2 of list not affecting emissions, page 3), the reference to helper cooling towers later in the document appears to reference only one, total. Please see Section III., page 12 under BACT, and Item TTT., Page 17. We suggest that these refer to tower(s) in the plural.

✓ In those descriptions of PSD applicability, I suggest we more accurately reflect that the intent in all cases is to limit to no more than "significant" increase. This key modifier is the real trigger for PSD. So, for clarification, we suggest using "significant" wherever related to "increases" when described under PSD. Call me and I'll point out the locations (several).

✓ In Condition 9 of the recommended AO language, on page 18, in the paragraph immediately following the Dust Collectors permit limits, it states that readings will be recorded monthly. Does this mean that we must change the form already approved by Title V? Please refer to the form we faxed earlier. Currently the form shows that the reading are checked and verified to me in range monthly, but the actual number is not recorded. If this is not intended to change the way we are doing things, then we recommend the sentence read something like "Intermittent checks of the gauge readings are required monthly." Otherwise, it looks like IPSC must resubmit a new form for approval to Title V. Also, in this condition, shown the differential pressures be shown as a range, such as 0.5 to 12? It now shows 0.5 and 12.

✓ In Condition 13, Page 20, emergency is defined as interruption of power from public utilities. This may be too narrow for conditions under which emergency generators are operated. They are run specifically for safe shut down of the facility due to power interruption of any reason, not just loss of power from public utilities. This may be reworded as "Emergency generators shall be operated only for safe shut down of the facility when isolated from other power sources, except....."

✓ In Condition 24, page 22, it refers to where CEM monitoring occurs. Note that CEMs are located in the stack and at the scrubber INLET, not outlet.

Other comments relate to what we discussed on Monday:

✓ The Plant Emission Summary table on pages 11 & 12 shows 0.69 tons for projected future emission and for emission increase for VOC. The projected future should 12.21 tons.

In Condition 7 of the Recommended AO terms, page 15, we discussed dropping the reference to the experimental AO's which are no longer valid.

In Condition 9, page 17, we discussed removing the CO limit because we are using another one in Condition 12, page 20.

In Condition 24, page 22, we asked about compiling rolling 12 month data quarterly. We also discussed re-merging the paragraphs of Condition 24 that are separated by Condition 25.